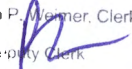


ORIGINAL

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U.S.D.C. Atlanta

SEP 27 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Kevin P. Warner, Clerk
By  Deputy Clerk

UNITED STATES OF AMERICA

v.

KAMIR BROWN BLANCHARD

Criminal Indictment

No. 1:22-cr-

1:22-CR-0358

THE GRAND JURY CHARGES THAT

Count One
(Conspiracy - 18 U.S.C. § 371)

Beginning on a date unknown to the Grand Jury, but from at least on or about March 14, 2020, and continuing through on or about June 16, 2021, in the Northern District of Georgia and elsewhere, the defendant, KAMIR BROWN BLANCHARD, along with E.J.A., and others known and unknown to the grand jury, knowingly and willfully conspired, agreed, and had a tacit understanding with one another, to commit a federal offense; that is, to knowingly make a false and fictitious written statement to a licensed firearms dealer under Chapter 44, Title 18, United States Code, in connection with the acquisition of a firearm, which statement was intended and likely to deceive the federally licensed firearms dealer as to a fact material to the lawfulness of the acquisition of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among other means, the following:

1. Defendant KAMIR BROWN BLANCHARD, and others unlawfully purchased firearms in the Northern District and then shipped the weapons to the actual transferee and buyers of the weapons.

2. KAMIR BROWN BLANCHARD completed an ATF Form 4473 at the time of the purchase of the firearms. ATF Form 4473 is the official firearms transaction record for intrastate, over-the-counter sales, and dispositions of firearms, which must be maintained by federally licensed firearms dealers.

3. KAMIR BROWN BLANCHARD falsely attested in each ATF Form 4473 completed at the time of the purchase of the firearms from federally licensed firearms dealers that he was the actual transferee and buyer of the firearms.

4. Contrary to his attestations on the ATF Form 4473, KAMIR BROWN BLANCHARD was not the actual purchaser and transferee of the firearms.

Overt Acts

In furtherance of the conspiracy, the defendant, KAMIR BROWN BLANCHARD, and others known and unknown to the Grand Jury, committed at least one overt act that included, on or about each date listed in Column A below, KAMIR BROWN BLANCHARD's illegal purchase, from the licensed firearms dealers listed in Column B below, of at least one of the corresponding firearms listed in Column C below:

Column A	Column B	Column C
Date	Licensed Firearms Dealer	Firearm(s) Acquired by Defendant
March 14, 2020	Adventure Outdoors	Smith & Wesson, model SW40VE, .40 caliber pistol
April 24, 2020	Eastin Firearms	Chiappa, model M four 22, .22 caliber rifle
May 1, 2020	Eastin Firearms	Emperor, model MTP20, 20-gauge shotgun Walther, model PPS, 9mm caliber pistol
May 23, 2020	Adventure Outdoors	Smith & Wesson, model M&P-15, 5.56 caliber rifle
June 24, 2020	Eastin Firearms	(2) Taurus, model G2C, 9mm caliber pistols
September 20, 2020	Bass Pro Shops Outdoor World # 13	(2) Taurus, model PT111 G2A, 9mm caliber pistols
September 29, 2020	Eastin Firearms	(4) Polymer 80, model PFS9, multi caliber lower receivers
October 2, 2020	Adventure Outdoors	(4) Taurus, model G2C, 9mm caliber pistols
October 17, 2020	Lovejoy Pawn, LLC	Glock, model 22, .40 caliber pistol
November 27, 2020	Adventure Outdoors	(2) Springfield, model XD, 9mm caliber pistols Heritage Manufacturing, model RB22B4-CV, .22 caliber revolver SAR USA, model SAR9BL, 9mm caliber pistol
February 16, 2021	Lovejoy Pawn, LLC	SCCY Industries, model CPX-2, 9mm caliber pistol
February 24, 2021	Lovejoy Pawn, LLC	Hi-Point, model C9, 9mm caliber pistol Century Arms, model VSKA, 7.62 caliber rifle
February 25, 2021	Adventure Outdoors	Mosin Nagant, model M91/30, 7.62 caliber rifle
March 3, 2021	Eastin Firearms	Palmetto State Armory, model PA-15, multi caliber lower receiver
March 23, 2021	Adventure Outdoors	(2) Taurus, model G2C, 9mm caliber pistols

April 3, 2021	Adventure Outdoors	(3) Taurus, model G2C, 9mm caliber pistols
June 16, 2021	Eastin Firearms	(2) Taurus, model G2C, 9mm caliber pistols

All in violation of Title 18, United States Code, Section 371.

Count Two
(Illegally Dealing in Firearms – 18 U.S.C. § 922(a)(1)(A))

Between on or about March 14, 2020, through on or about June 16, 2021, in the Northern District of Georgia and elsewhere, the defendant, KAMIR BROWN BLANCHARD, and others known and unknown by the Grand Jury, aided and abetted by one another, and not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18 of the United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D), and Section 2.

Counts Three through Nineteen
(Making False Statement to Licensed Firearms Dealer – 18 U.S.C. § 922(a)(6))

On or about each date alleged in Column B below, in the Northern District of Georgia, the defendant, KAMIR BROWN BLANCHARD, and others known and unknown to the Grand Jury, aided and abetted by one another, knowingly made a false and fictitious written statement to the licensed dealer of a firearm within the meaning of Chapter 44, of Title 18 of the United States Code, as identified in Column C below, in connection with the acquisition of at least one of the corresponding firearms listed in Column D below:

Column A	Column B	Column C	Column D
Count	Date	Licensed Firearms Dealer	Firearm(s) Acquired by Defendant
3	March 14, 2020	Adventure Outdoors	Smith & Wesson, model SW40VE, .40 caliber pistol
4	April 24, 2020	Eastin Firearms	Chiappa, model M four 22, .22 caliber rifle
5	May 1, 2020	Eastin Firearms	Emperor, model MTP20, 20-gauge shotgun Walther, model PPS, 9mm caliber pistol
6	May 23, 2020	Adventure Outdoors	Smith & Wesson, model M&P-15, 5.56 caliber rifle
7	June 24, 2020	Eastin Firearms	(2) Taurus, model G2C, 9mm caliber pistols
8	September 20, 2020	Bass Pro Shops Outdoor World # 13	(2) Taurus, model PT111 G2A, 9mm caliber pistols
9	September 29, 2020	Eastin Firearms	(4) Polymer 80, model PFS9, multi caliber lower receivers
10	October 2, 2020	Adventure Outdoors	(4) Taurus, model G2C, 9mm caliber pistols
11	October 17, 2020	Lovejoy Pawn, LLC	Glock, model 22, .40 caliber pistol
12	November 27, 2020	Adventure Outdoors	(2) Springfield, model XD, 9mm caliber pistols Heritage Manufacturing, model RB22B4-CV, .22 caliber revolver SAR USA, model SAR9BL, 9mm caliber pistol
13	February 16, 2021	Lovejoy Pawn, LLC	SCCY Industries, model CPX-2, 9mm caliber pistol
14	February 24, 2021	Lovejoy Pawn, LLC	Hi-Point, model C9, 9mm caliber pistol Century Arms, model VSKA, 7.62 caliber rifle
15	February 25, 2021	Adventure Outdoors	Mosin Nagant, model M91/30, 7.62 caliber rifle
16	March 3, 2021	Eastin Firearms	Palmetto State Armory, model PA-15, multi caliber lower receiver
17	March 23, 2021	Adventure Outdoors	(2) Taurus, model G2C, 9mm caliber pistols

18	April 3, 2021	Adventure Outdoors	(3) Taurus, model G2C, 9mm caliber pistols
19	June 16, 2021	Eastin Firearms	(2) Taurus, model G2C, 9mm caliber pistols

which statement was intended and likely to deceive the firearms dealers as to a fact material to the lawfulness of the acquisition of said firearm(s), under Chapter 44, of Title 18 of the United States Code, when in fact, as Defendant KAMIR BROWN BLANCHARD then knew, he falsely represented that he was the actual buyer of said firearm(s) when, in fact, he was purchasing the firearm(s) on behalf of another person, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), and Section 2.

Count Twenty
(Unlawful Export of Firearm - 18 U.S.C. § 554)

On or about February 16, 2021, in the Northern District of Georgia, the defendant, KAMIR BROWN BLANCHARD, did fraudulently and knowingly export and send from the United States, to the Country of Panama, merchandise, articles and objects, that is, a firearm, contrary to the laws and regulations of the United States, in that the defendant failed to declare the firearm to a common carrier, in violation of Title 18, United States Code, section 922(e), all in violation of Title 18, United States Code, Section 554, and Section 2.

Count Twenty-One
(Unlawful Export of Firearm – 18 U.S.C. § 554)

On or about June 18, 2021, in the Northern District of Georgia, the defendant, KAMIR BROWN BLANCHARD, did fraudulently and knowingly export and send from the United States to Panama, merchandise, articles and objects, that is, a firearm, contrary to the laws and regulations of the United States, in that the defendant, KAMIR BROWN BLANCHARD, failed to declare the firearm to a common carrier, in violation of Title 18, United States Code, section 922(e), all in violation of Title 18, United States Code, Section 554, and Section 2.

Forfeiture

Upon conviction of one or more of the offenses alleged in Counts Two through Nineteen of this Indictment, the defendant, KAMIR BROWN BLANCHARD, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) all firearms and ammunition involved in the commission of the offense.

Upon conviction of one or more of the offenses alleged in Counts Twenty and Twenty-One of this Indictment, the defendant, KAMIR BROWN BLANCHARD, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) any property constituting, or derived from, proceeds which were obtained directly or indirectly as the result of such violation(s).

If, as a result of any act or omission of the defendant(s), any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without undue complexity or difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant(s) up to the value of the above forfeitable property.

A

True

BILL

[Signature]
FOREPERSON

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DASHENE A. COOPER
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